

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

MARDY B. WILLIAMS, SR.,)
)
Plaintiff,)
)
v.) Case No. 2:05CV-1220-T
)
NORMENT SECURITY GROUP, INC.,) Judge W. Keith Watkins
TED ARKUSZESKI, JOHN WOODS,)
BURTICE BRIGHT, AND SHELBY DOE,)
)
Defendants.)

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Norment Security Group, Inc. (“Norment”), Ted Arkuszeski (“Arkuszeski”), John Woods (“Woods”), and Burtice Bright (“Bright”) (collectively referred to herein as “Defendants”), by and through their attorneys, Capell & Howard, P.C. and Seyfarth Shaw LLP, respectfully move this Court to grant their unopposed motion for an extension of thirty (30) days for Defendants to answer or otherwise respond to Plaintiff’s Complaint. In support of their motion, Defendants state as follows:

1. On December 23, 2005, Plaintiff filed a Complaint against Norment, Arkuszeski, Woods, Bright, and Shelby Doe.
2. Defendants Norment, Arkuszeski, Woods, and Bright were served with the summons and Plaintiff’s Complaint via process server on January 3, 2006.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), Defendants’ answer or other response to Plaintiff’s Complaint is due on January 23, 2006.
4. Counsel for Defendants did not become aware of the Complaint until January 23, 2006.

5. Plaintiff's Complaint contains several specific factual allegations that require a thorough investigation to answer.

6. As a result, Defendants request an additional thirty (30) days to complete their investigation before filing an answer or other response.

7. Two of Defendants' counsel, John Powers and Molly Eastman, conferred with one of Plaintiff's counsel, Chandra C. Wright, regarding the thirty (30) day extension. Ms. Wright consented to the extension.

8. This motion is made in good faith and is not filed for the purpose of causing delay.

WHEREFORE, Defendants Norment, Arkuszeski, Woods, and Bright respectfully request that the Court grant their unopposed motion for an additional thirty (30) days to answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

NORMENT SECURITY GROUP, INC., TED
ARKUSZESKI, JOHN WOODS, AND BURTICE
BRIGHT

By s/ Bruce J. Downey
One of Their Attorneys

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John W. Powers (motion for admission *pro hac vice* to be filed)
Anne E. Duprey (motion for admission *pro hac vice* to be filed)
Molly Eastman (motion for admission *pro hac vice* to be filed)
Seyfarth Shaw LLP
55 East Monroe Street, Suite 4200
Chicago, Illinois 60603
(312) 269-8000

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2006, I electronically filed **Defendants' Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint** with the Clerk of Court using the CM/ECF system, which will send notification of this filing to:

Brantley W. Lyons, P.C.
Attorney at Law
4256 Lomac Street
Montgomery, AL 36106

Chandra C. Wright, P.C.
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s/ Bruce J. Downey
Bruce J. Downey